

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re Ex Parte Application of Porsche Automobil Holding SE for an Order Pursuant to 28 U.S.C. § 1782 Granting Leave to Obtain Discovery for Use in Foreign Proceedings.

Case No.

DECLARATION OF SUHANA S. HAN

SUHANA S. HAN hereby declares under penalty of perjury as follows:

1. I am admitted to practice in the United States District Court for the Southern District of New York and am a member of the law firm Sullivan & Cromwell LLP, counsel to Porsche Automobil Holding SE (“PSE”) in the above-captioned action. I submit this Declaration in support of PSE’s *Ex Parte* Application for an Order Pursuant to 28 U.S.C. § 1782 Granting Leave to Obtain Discovery for Use in Foreign Proceedings.

2. Attached hereto are true and correct copies of the following:

Chart setting forth the entities from whom discovery is sought in PSE’s 28 U.S.C. § 1782 application (“Respondents”); their relationship to certain plaintiffs in a civil suit now pending before the Higher Regional Court of Stuttgart; and their business addresses.	Exhibit A
Proposed subpoena, to be served in substantially the same form on each Respondent, for the production of documents.	Exhibit B
Proposed subpoena, to be served in substantially the same form on each Respondent, for deposition testimony.	Exhibit C
Elliott Associates, L.P. Schedule 13D, dated Sept. 22, 2017.	Exhibit D
Elliott Management Corp. Form ADV, dated July 16, 2018.	Exhibit E

Elliott Management Corporation Website, *About Elliott*, Exhibit F
<https://www.elliottmgmt.com/about-elliott/> (last visited Apr. 4,
2019).

Excerpts from PSE, Annual Report: 2017, dated Mar. 20, 2018. Exhibit G

Declaration of Dr. Markus Meier in Support of *Ex Parte* Application Exhibit H
of Porsche Automobil Holding SE for an Order Pursuant to 28
U.S.C. § 1782 Granting Leave to Obtain Discovery for Use in
Foreign Proceedings.

Executed on April 5, 2019 in New York, New York.

/s/ Suhana S. Han

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